



State of New Jersey

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

DEPARTMENT of ENVIRONMENTAL PROTECTION

AIR QUALITY, ENERGY AND SUSTAINABILITY

Division of Air Quality

Bureau of Stationary Sources

401 E. State Street, 2nd floor, P.O. Box 420, Mail Code 401-02
Trenton, NJ 08625-0420

BOB MARTIN
Commissioner

December 12, 2017

[REDACTED]

RE: Formaldehyde Emissions for Internal Combustion Engines
Program Interest #: [REDACTED]
Permit Activity #: PCP 000002
NJID #: E4301

Dear Permittee,

After consulting with our Federal Environmental Protection Agency counterparts, the Department determined that volatile organic compounds(VOC) and formaldehyde emissions emitted from internal combustion(IC) engines that combust gaseous fuels to include biogas, landfill gas, and natural gas have been underreported. Formaldehyde is a component of VOC emissions and must be properly quantified for inclusion in the VOC emission limit established in approved air permits for these sources and any source test to determine compliance with established limits.

This letter serves as a notification that if your current approved air permit does not include formaldehyde in the VOC allowable, you must submit an administratively complete permit modification with the appropriate allowable limit expressed in mass emissions (lb/hr) as soon as possible, but no later than ninety (90 days) prior to the expiration date of your current permit. Please note that pursuant to New Jersey Administrative Codes 7:27-8 and 7:27-22 et. seq., emissions for all contaminants that are above reporting threshold must be included in any permit application.

The test methods typically used to quantify VOC emissions from IC engines do not measure or include formaldehyde. It is for this reason that effective immediately, upon submitting a test protocol in accordance with the terms of the air permit for IC engines that combust gaseous fuels, formaldehyde testing will be required to ensure that all VOC emissions are properly quantified pursuant to New Jersey Administrative Code 7:27-16.22 et. seq.

If you have any questions regarding this matter, please feel free to contact Kenneth Ratzman of the Bureau of Stationary Sources for questions regarding air permitting at 609-292-0834 or Michael Klein of the Emission Measurement Section for questions regarding source testing at 609-984-3443.

Sincerely,

Richelle B. Wormley, Director
Division of Air Enforcement

Francis Steitz, Director
Division of Air Quality